

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

TANYA BROWN,	)	Case No. 1:16-CV-00921
<i>Mother and Administrator of the Estate</i>	)	
<i>of Brandon Jones,</i>	)	
	)	
Plaintiff,	)	JUDGE SOLOMON OLIVER, JR.
	)	
vs.	)	
	)	<u>JOINT MOTION FOR REFERRAL</u>
	)	<u>TO MAGISTRATE JUDGE FOR</u>
	)	<u>MEDIATION AND FOR A</u>
CITY OF CLEVELAND., <i>et al.</i> ,	)	<u>STAY OF LITIGATION DATES</u>
	)	
Defendants.	)	
	)	

Now come the parties, by and through their respective counsel, and hereby move this Honorable Court for an Order referring this matter to the Magistrate Judge for mediation, so that the parties may attempt to resolve this matter through settlement. The parties submit that a stay of litigation deadlines is appropriate, so that time and resources can be dedicated to attempting to resolve this matter.

The parties have completed all fact discovery, and have served expert reports. Currently, the parties have engaged a total of nine (9) experts. Each of these experts have authored a separate report. These experts are located throughout the United States and one expert is located in Alberta, Canada.

Prior to spending significant resources associated with travel, costs, and other expenses associated with the depositions of these experts, which includes taxpayer dollars

on behalf of the Defendants, the parties have agreed to make a good faith effort to resolve this matter. Further, this litigation has included dozens of fact witnesses and extensive written discovery. The parties believe that the best mechanism to attempt to resolve a matter of this complexity and breadth would be through mediation.

Lastly, the current pending litigation dates are an expert discovery deadline and a dispositive motion deadline. The parties propose that in the event this matter is not resolved at mediation, these deadlines be rescheduled by agreement of the parties and subject to final approval by the Court.

Wherefore, the parties move this Honorable Court for a referral of this case to the Magistrate Judge for mediation and a stay of the pending litigation deadlines.

Respectfully Submitted,

/s/ Paul J. Cristallo

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of October, 2018, a copy of the foregoing Motion for Referral to Mediation and for a Stay of Litigation Dates was served by electronic filing via the Federal Court's ECF system to the following:

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/s/ Paul J. Cristallo \_\_\_\_\_